

EXHIBIT “A”



**Service of Process
Transmittal**

02/18/2020

CT Log Number 537205974

TO: Angela Aizawa
Verizon Communications Inc.
1 Verizon Way
Basking Ridge, NJ 07920-1097

RE: Process Served in Delaware

FOR: Verizon Pennsylvania LLC (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Nancy Ostrow and Douglas Ostrow, etc., Pltfs. vs. Verizon Pennsylvania LLC, Dft.

DOCUMENT(S) SERVED: Letter, Complaint, Notice, Verification, Interrogatories

COURT/AGENCY: Allegheny County - Court of Common Pleas, PA
Case # GD20002223

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall

ON WHOM PROCESS WAS SERVED: The Corporation Trust Company, Wilmington, DE

DATE AND HOUR OF SERVICE: By Certified Mail on 02/18/2020 postmarked: "Not Post Marked"

JURISDICTION SERVED : Delaware

APPEARANCE OR ANSWER DUE: Within 20 days after this complaint and notice are served

ATTORNEY(S) / SENDER(S): David I. Ainsman
Ainsman Levine, LLC
310 Grant Street, Suite 1500
Pittsburgh, PA 15219
412-338-9030

REMARKS: Please note that summons is not served at the time of service. Please note:
Transmittal has been edited to correct lawsuit type.

ACTION ITEMS: CT has retained the current log, Retain Date: 02/18/2020, Expected Purge Date:
02/23/2020

Image SOP

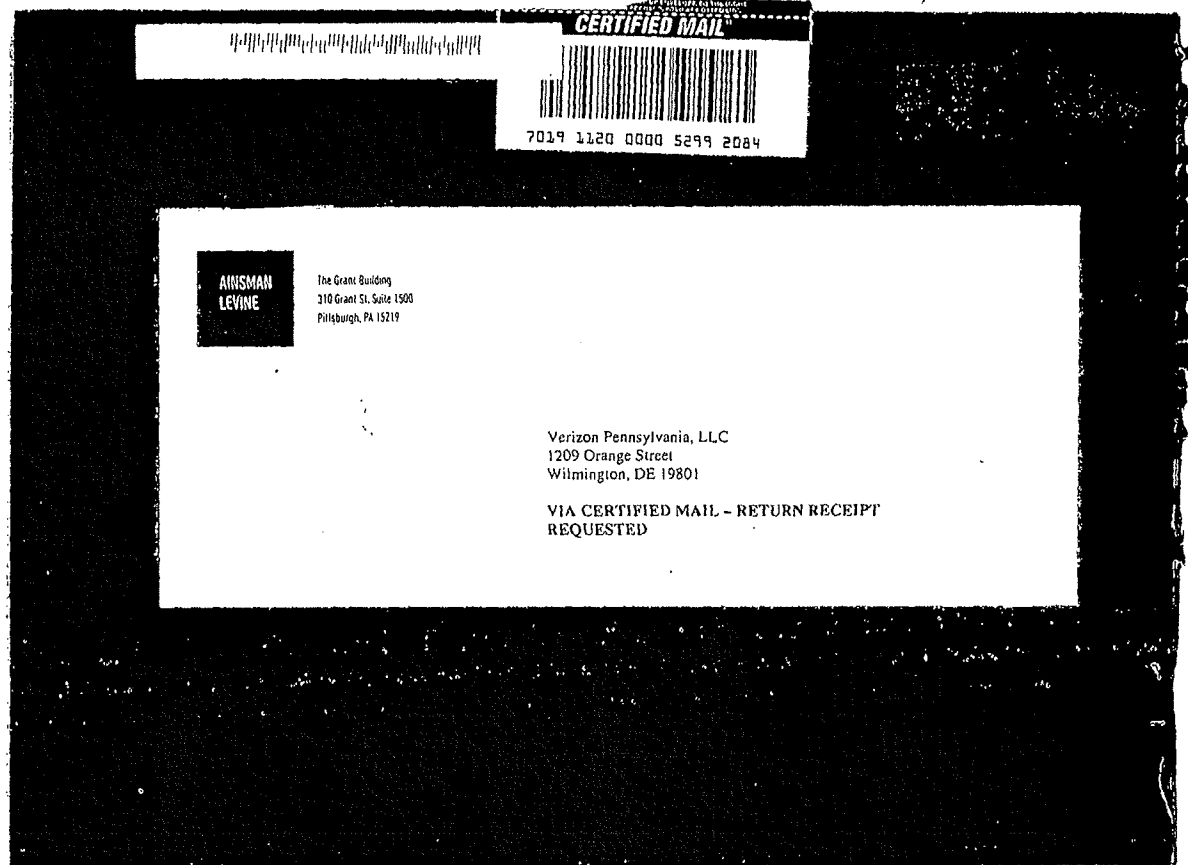
Email Notification, Alice Burke alice.burke@verizon.com

Email Notification, JACK MINNEAR jack.minnear@verizon.com

Email Notification, David Haga david.haga@verizon.com

SIGNED: The Corporation Trust Company
ADDRESS: 1999 Bryan St Ste 900
Dallas, TX 75201-3140

For Questions: 877-564-7529
MajorAccountTeam2@wolterskluwer.com



NOTICE OF SUIT TO SHERIFF OF ALLEGHENY CO.

You are hereby notified that on 02/10/2020

a COMPLAINT has been filed in this case

and you are required to serve the same on or before the

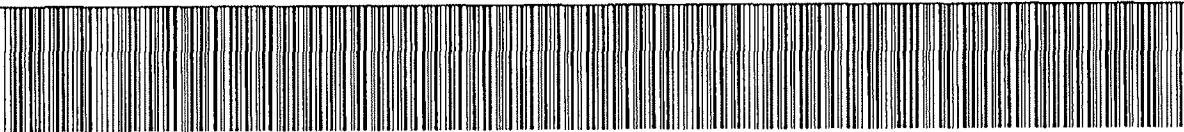
05/10/2020

Michael McGeever, Director

Department of Court Records

COMPLAINT IN CIVIL ACTION**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA**

Plaintiff(s)	Case Number: GD-20-002223
Ostrow, Douglas	Type of pleading: Complaint
Ostrow, Nancy	Filed on behalf of: Ostrow Nancy
	<u>Ainsman David</u> (Name of filing party)
Defendant(s)	VS
Verizon Pennsylvania LLC,	<input checked="checked" type="checkbox"/> Counsel of Record
	<input type="checkbox"/> Individual, If Pro Se
	Name, Address and Telephone Number: Ainsman David Ainsman Levine LLC 310 Grant Street, Suite 1500 Pittsburgh, PA, 15219 412 3389030 412 3389030 Attorney's State ID: 25437



Michael McGeever, Director, Department of Court Records

Filed 2/10/2020

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

NANCY OSTROW, and DOUGLAS
OSTROW, her husband,

Plaintiffs,

v.

VERIZON PENNSYLVANIA LLC,

Defendant.

CIVIL DIVISION

No: GD 20-002223

Issue:

Code:

COMPLAINT IN CIVIL ACTION

Filed on behalf of Plaintiffs

Counsel of Record for this Party:

David I. Ainsman, Esquire
PA I.D. No. 25437

Ainsman Levine, LLC
Firm No. 975

310 Grant Street, Suite 1500
Pittsburgh, PA 15219

(412) 338-9030 – Phone
(412) 338-9167 – Fax

da@ainsmanlevine.com

JURY TRIAL DEMANDED

{AL626294.1}

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

NANCY OSTROW, and DOUGLAS)	CIVIL DIVISION
OSTROW, her husband,)	
)	No:
Plaintiffs,)	
)	Issue:
v.)	
)	Code:
VERIZON PENNSYLVANIA LLC,)	
)	
Defendant.)	

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within TWENTY (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERRAL SERVICE

Allegheny County Bar Association
11th Floor Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 261-5555

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

NANCY OSTROW, and DOUGLAS)	CIVIL DIVISION
OSTROW, her husband,)	
)	No:
Plaintiffs,)	
)	Issue:
v.)	
)	Code:
VERIZON PENNSYLVANIA LLC,)	
)	
Defendant.)	

COMPLAINT IN CIVIL ACTION

AND NOW, come the Plaintiffs, Nancy Ostrow and Douglas Ostrow, her husband, by and through their attorneys, Ainsman Levine, LLC, and David I. Ainsman, Esquire, and file the following Complaint in Civil Action, and in support thereof aver the following:

1. Plaintiffs, Nancy Ostrow and Douglas Ostrow are adult individuals who are married and currently reside in Allegheny County at 22 Pintail Drive, Pittsburgh, Pennsylvania 15238.
2. Defendant, Verizon Pennsylvania LLC, is a limited liability company incorporated in Delaware with a registered business address at 1209 Orange Street, Wilmington, Delaware 19801.
3. The events hereinafter described occurred on or about May 10, 2018, at approximately 3:30 p.m. on Plaintiff's driveway located 22 Pintail Drive, Pittsburgh, Pennsylvania 15238 (hereinafter "premises").
4. For some time period prior to the incident, a wire was strung across the driveway by Verizon.

5. At all times material hereto, it is believed and therefore averred that Defendant, Verizon Pennsylvania LLC, possessed, managed, owned, maintained, and/or controlled the downed wire and was responsible for the maintenance, inspection, and condition of said wire.

6. At that time and place, Plaintiff, Nancy Ostrow, was caused to trip and fall to the ground as a result of the downed wire.

7. As a result of tripping over the loose cable, Plaintiff was caused to fall to the ground and strike her body and face thereon, thereby suffering and sustaining the personal injuries described more fully herein.

8. It is believed and therefore averred that Defendant had actual and/or constructive notice of the downed wire that created a dangerous, hazardous, and/or otherwise unsafe condition prior to the time at which the Plaintiff's fall occurred.

9. As a direct and proximate result of the Defendant's negligence, Plaintiff sustained the following injuries, some or all of which may be permanent in nature:

- a. Closed head injury;
- b. Cerebral concussion;
- c. Bilateral feet abrasion;
- d. Facial fracture;
- e. Nondisplaced fracture of maxillary spine tip;
- f. Lip laceration;
- g. Lip trauma;
- h. Vertigo;
- i. Balance problems;
- j. Photosensitivity;

- k. Phonosensitivity;
- l. Facial pain;
- m. Post-traumatic amnesia;
- n. Dizziness;
- o. Anxiety;
- p. Memory loss;
- q. Scarring;
- r. Impingement syndrome of left shoulder;
- s. Shoulder pain; and
- t. Other possible serious and/or severe injuries, the extent of which is not yet known.

10. As a result of the aforementioned injuries, Plaintiff, Nancy Ostrow, has sustained the following damages:

- a. She has endured and may continue to endure pain, suffering, inconvenience, embarrassment, mental anguish, and emotional and psychological trauma;
- b. She has been and may continue to be required to expend money for medical treatment and care, medical supplies, rehabilitation, medicines, and other attendant services;
- c. Her general health, strength, and vitality have been impaired;
- d. She has been and may in the future be unable to enjoy various pleasures of life that she previously enjoyed; and
- e. She has been permanently scarred and disfigured.

COUNT I
Nancy Ostrow v. Verizon Pennsylvania LLC
NEGLIGENCE

11. Paragraphs one (1) through and including ten (10) are hereby incorporated by reference as if fully set forth herein.

12. The losses, injuries, and damages sustained by Plaintiff, Nancy Ostrow, were caused by the negligence of Defendant, Verizon Pennsylvania LLC, as described herein, *supra*, and in some or all of the following particulars:

- a. In permitting the wire to be, and remain an unsafe, dangerous, and/or hazardous condition;
- b. In creating the unsafe, dangerous, and/or hazardous condition described herein;
- c. In permitting the unsafe, dangerous, and/or otherwise hazardous condition to exist when Defendant knew, or should have known, that the condition posed a danger to individuals;
- d. In failing to reasonably inspect the area where the unsafe, dangerous, and/or hazardous condition existed;
- e. In failing to remedy the unsafe, dangerous, and/or hazardous condition when Defendant knew, or should have known, that it created a serious risk of injury to individuals;
- f. In failing to warn or otherwise notify Plaintiff of the unsafe, dangerous, and/or hazardous condition;
- g. In failing to remove, repair, or remediate the hazard created by the downed wire in a reasonable amount of time.

WHEREFORE, Plaintiff, Nancy Ostrow, demands judgment against Defendant, Verizon Pennsylvania LLC, in an amount that exceeds the arbitration limits of this county plus costs and interest.

COUNT I
Douglas Ostrow v. Verizon Pennsylvania LLC
LOSS OF CONSORTIUM

13. Paragraphs one (1) through and including twelve (12) are hereby incorporated by reference as if fully set forth herein.

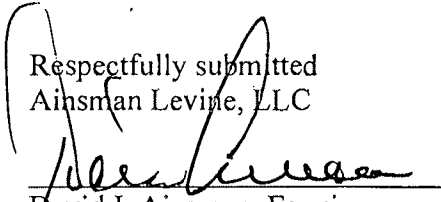
14. Plaintiff, Douglas Ostrow, is and, at all times relevant hereto, was married to Plaintiff, Nancy Ostrow, and resides with him at the address identified in paragraph one (1) herein.

15. As a direct and proximate result of the negligence of Defendant, Verizon Pennsylvania LLC, Plaintiff, Douglas Ostrow, has suffered the following damages:

- a. He has been and will be required to expend money for his wife's medical care, medical supplies, and medicine;
- b. He has been and will in the future be deprived of the services, assistance, and companionship of his wife; and
- c. He has suffered a loss of consortium.

WHEREFORE, Plaintiff, Douglas Ostrow, demands judgment against Defendant, Verizon Pennsylvania LLC, in an amount that exceeds the arbitration limits of this county plus costs and interest.

Respectfully submitted
Ainsman Levine, LLC



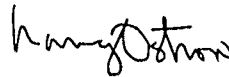
David I. Ainsman, Esquire
Counsel for Plaintiffs

VERIFICATION

We verify that the statements made in the COMPLAINT IN CIVIL ACTION are true and correct; that the attached COMPLAINT IN CIVIL ACTION is based upon information which we have furnished to our counsel and information which has been gathered by our counsel in preparation of the lawsuit. The language of the COMPLAINT IN CIVIL ACTION is that of counsel and not the Plaintiffs. We have read the COMPLAINT IN CIVIL ACTION and, to the extent that the COMPLAINT IN CIVIL ACTION is based upon information which we have given to our counsel, it is true and correct to the best of our knowledge, information, and belief. To the extent that the content of the COMPLAINT IN CIVIL ACTION is that of counsel, we have relied upon counsel in making this Verification. We understand that false statements herein made are subject to the penalties of 18 Pa. C.S. § 4904 relating to the unsworn falsification to authorities.

02/07/2020

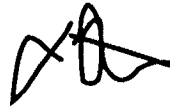
DATED



NANCY OSTROW

02/07/2020

DATED



DOUGLAS OSTROW